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Co-Counsel for the Class 10 Liquidation Trust

In the Matter of:	:	UNITED STATES BANKRUPTCY COURT
	:	FOR THE DISTRICT OF NEW JERSEY
	:	HONORABLE GLORIA M. BURNS
SHAPES/ARCH HOLDINGS, L.L.C., <i>et al.</i> ,	:	CASE NO. 08-14631(GMB)
	:	
Reorganized Debtors.	:	(Jointly Administered)
	:	
	:	Chapter 11
	:	
	:	NOTICE OF MOTION OF THE CLASS 10
	:	LIQUIDATION TRUST FOR ENTRY OF
	:	AN ORDER QUASHING THE SUBPOENA
	:	ISSUED BY A. JEROME GROSSMAN
	:	AND FRANK KESSLER PURSUANT TO
	:	FED. R. BANKR. P. 9016 AND FED. R. CIV.
	:	P. 45

TO: All Parties-in-Interest

PLEASE TAKE NOTICE that on March 13, 2012, at 10:00 a.m., or as soon thereafter as counsel may be heard, the undersigned, attorneys for Class 10 Liquidation Trust (the "Trust") of Shapes/Arch Holdings L.L.C., Shapes L.L.C., Delair, L.L.C., Accu-Weld, L.L.C., and Ultra

L.L.C., the within Reorganized Debtors, shall move before the Honorable Gloria M. Burns, United States Bankruptcy Judge, at the United States Bankruptcy Court, Mitchell H. Cohen U.S. Courthouse, 400 Cooper Street, 4th Floor, Camden, New Jersey 08101, for entry of an Order quashing the subpoena issued by A. Jerome Grossman and Frank Kessler pursuant to Fed. R. Bankr. P. 9016 and Fed. R. Civ. P. 45 (the “Motion”).

PLEASE TAKE FURTHER NOTICE that in support of the Motion, the undersigned shall rely on the accompanying Application which sets forth the relevant factual and legal bases upon which the requested relief should be granted. A proposed Order granting the requested relief also is submitted herewith.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief requested in the Motion shall: (i) be in writing, (ii) state with particularity the basis of the objection; and (iii) be filed with the Clerk of the United States Bankruptcy Court electronically by attorneys who regularly practice before the Bankruptcy Court in accordance with the General Order Regarding Electronic Means for Filing, Signing, and Verification of Documents dated March 27, 2002 (the “General Order”) and the Commentary Supplementing Administrative Procedures dated as of March 2004 (the “Supplemental Commentary”) (the General Order, the Supplemental Commentary and the User’s Manual for the Electronic Case Filing System can be found at www.njb.uscourts.gov, the official website for the Bankruptcy Court) and, by all other parties-in-interest, on CD-ROM in Portable Document Format (PDF), and shall be served in accordance with the General Order and the Supplemental Commentary, so as to be received no later than seven (7) days before the hearing date set forth above.

PLEASE TAKE FURTHER NOTICE that unless objections are timely filed, the Motion shall be deemed uncontested in accordance with D.N.J. LBR 9013-1(a), and the relief requested may be granted without further notice or hearing.

PLEASE TAKE FURTHER NOTICE that the undersigned requests oral argument.

COLE, SCHOTZ, MEISEL,
FORMAN & LEONARD, P.A.

By: /s/ Felice R. Yudkin
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-and-

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DATED: February 16, 2012